

**FILED**  
**FEBRUARY 8, 2008**  
 MICHAEL W. DOBBINS  
 CLERK, U.S. DISTRICT COURT

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF ILLINOIS  
 EASTERN DIVISION**

**08 C 855**

**MOORE WALLACE NORTH AMERICA, INC., )**  
**)**  
**Plaintiff, )**  
**)**  
**)**  
**)**  
**v. )**  
**)**  
**)**  
**PFE INTERNATIONAL LIMITED and )**  
**PFE INTERNATIONAL INC. )**  
**)**  
**Defendants. )**  
**)**

**JUDGE MANNING  
 MAGISTRATE JUDGE BROWN**

**COMPLAINT FOR PATENT INFRINGEMENT**

Moore Wallace North America, Inc. (“Moore Wallace”), by and through its attorneys,  
 files this Complaint for patent infringement against PFE International Limited and PFE  
 International, Inc. (“PFE”) and in support thereof, states as follows:

**The Parties, Jurisdiction and Venue**

1. Moore Wallace is a Delaware corporation with its principal place of business at 1200  
 Lakeside Drive, Bannockburn, Illinois, 60015.

2. PFE International Limited is a United Kingdom corporation located at Oakwood Hill  
 Industrial Estate, Oakwood Hill, Loughton Essex IG10 3TZ England. Upon information and  
 belief, PFE International Limited sells pressure seal equipment throughout the United States,  
 including this District.

3. PFE International Inc. is a corporation located at 195 Chastain Meadows Ct NW Ste  
 112, Kennesaw, Georgia. Upon information and belief, PFE International Inc. sells pressure seal  
 equipment throughout the United States, including this District.

4. Jurisdiction is proper under 28 U.S.C. §§ 1331, 1332, and 1338. Venue is proper pursuant to 28 U.S.C. §§ 1391(c) and 1400(b).

**Facts Giving Rise To Patent Infringement Of U.S. Patent No. 5,183,527**

5. Moore Wallace is the legal owner of U.S. Letters Patent No. 5,183,527 (“the ‘527 Patent”) which duly issued on February 2, 1993. (Exhibit A)

6. The ‘527 Patent relates to sealing pressure seal business forms such as mailers received in the mail. A pressure seal form contains adhesive along the perimeter near the edge of the form which allows the form to be folded and sealed together. The recipient tears the edge portion off along perforations to open and unfold the form. One such example is a 1099 tax form.

7. The ‘527 Patent further relates to equipment which seals pressure seal forms by passing the form through rollers which apply pressure to activate the pressure sensitive adhesive thereby sealing the form.

8. The ‘527 Patent uses at least a pair of rollers, i.e., sealer wheels, where the upper sealer wheel is movable relative to the lower sealer wheel insuring uniform application of sealing pressure to the adhesive of the form.

9. PFE has been infringing the ‘527 Patent by making, using, importing, selling, and/or offering for sale pressure seal mailer equipment that infringes the ‘527 Patent. Upon information and belief, PFE imports, sells or offers to sell the AS-1200 pressure sealer or its equivalent in this District which infringes the ‘527 Patent.

WHEREFORE, Moore Wallace requests the following relief from PFE:

- (1) an injunction from making, using or selling the infringing mailers;
- (2) damages adequate to compensate it for the infringement

pursuant to 35 USC § 284;

(3) prejudgment interest; and

(4) any further relief as this Court deems appropriate.

MOORE WALLACE NORTH  
AMERICA, INC.

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